

**UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

In re:)	
)	
LAKESHORE FARMS, INC.,)	Case No. 18-50077-btf11
)	
Debtor.)	

**NOTICE OF EXAMINATION PURSUANT TO RULE 2004
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

TO: RUSSELL, JONATHAN LEE
24806 HIGHWAY 159
FOREST CITY, MO 64451-9121

PLEASE TAKE NOTICE that pursuant to Rules 2004 and 7030(b) of the Federal Rules of Bankruptcy Procedure and Local Rule 2004-1, the United States Trustee will conduct an examination, to be recorded by electronic means, at the offices of at the offices of the United States Trustee, United States Courthouse, 400 East 9th Street, Suite 3440, Kansas City, Missouri, 64106, of Jonathan Lee Russell who is requested to bring with him to the examination the documents listed on Attachment A. The examination will commence at Wednesday, March 14, 2018, at 10:00 a.m. If necessary the examination will be adjourned until completed.

Respectfully submitted,

DANIEL J. CASAMATTA
ACTING UNITED STATES TRUSTEE

BY: /s/ Lloyd E. Mueller
Lloyd E. Mueller, TN Bar # 16540
Office of the United States Trustee
400 E. 9th Street, Room 3440
Kansas City, Mo 64106
Tel: (816) 512-1940
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Lloyd.e.mueller@usdoj.gov

CERTIFICATE OF MAILING

I hereby certify that a copy of the Notice of Examination Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure was served upon all parties receiving electronic notification and upon the following parties by electronic notification or first-class mail, postage prepaid, this 19th day of October, 2017:

Jonathan L. Russell
24806 Highway 159
Forest City, MO 64451-9121

Joanne B. Stutz
Evans & Mullinix, P.A.
Suite 200
7225 Renner Road
Shawnee, KS 66217

Janice E. Stanton
Stanton & Redlingshafer, LLC
104 West 9th Street, Suite 303
Kansas City, MO 64105

/s/ Lloyd E. Mueller
Lloyd E. Mueller

Attachment A

1. Copies of all documents supporting the statement made in Bankruptcy Case No. 18-50077, on Schedule A/B, Question 77 asserting that the Debtor has a property interest related to John Manville Farms, LLC valued at \$1,000,000.
2. Copies of all documents reflecting the payment of \$35,000 to Evans & Mullinix, P.A. as stated in response to Question 11 of the Statement of Financial Affairs.
3. Copies of all documents used to determine that Jonathan Russell received \$141,609.08 from the Debtor between January 1, 2017 and the February 28, 2018, as stated in response to Question 30 of the Statement of Financial Affairs.
4. Copies of the following documents related to loan transaction(s) between the Debtor and/or Jonathan Russell and any of the Manville Farms individuals or entities, including:
 - a) Promissory notes;
 - b) Security agreements;
 - c) All financial statements provided to the Manville Farms individual or entities support the loan(s).
5. Copies of the following documents related to Case No. 17HO-CC00050 pending the Circuit Court of Holt County, Missouri:
 - a) Motion for TRO;
 - b) Brief filed by Lakeshore Farms in support of TRO;
 - c) Briefs filed by Manville Farms and GWB;
 - d) Order overruling Lakeshore's motion for TRO.
6. Copies of the following documents related to 2013 Crop Insurance referenced in the Settlement Agreement dated March 9, 2018 between Russell, Manville and Great Western Bank (the "Settlement Agreement"):
 - a) Russell's application for 2013 crop insurance;
 - b) Claims Russell submitted to Great American Insurance for losses related to 2013 crop year;
 - c) Statements of position provided by Russell and Great American Insurance to the arbitrator in relation to 2013 crop insurance claims;
 - d) Written findings of the arbitrator in determining Russell's crop insurance claim related to the 2013 crop year.
7. Copies of the financial statements the Debtor submitted to Frontier Bank and ARM Lending in 2015, 2016, and 2017.

8. Copies of the financial statements Jonathan Russell submitted to Frontier Bank and ARM in 2015, 2016, and 2017.
9. Copies of the financial statements GDD Lakeshore Properties submitted to lenders in 2015, 2016, and 2017.
10. Copies of the federal tax returns filed by the Debtor, Russell, and GDD Lakeshore Properties for the 2015, 2016, and 2017 tax years.
11. Proof that Russell currently owns the real property to be transferred to Manville and GRW in the Settlement Agreement dated March 9, 2018.
12. All documents reflecting transfers between February 28, 2015 and February 28, 2018 of the real property to be transferred to Manville and GRW in the Settlement Agreement dated March 9, 2018.